

SOUTHERN ENVIRONMENTAL LAW CENTER

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August 5, 2009

Mr. Charles L.A. Terreni
Chief Clerk of the Commission
SC Public Service Commission
P.O. Drawer 11649
Columbia, SC 29211

RE: South Carolina Electric & Gas Company's Request for Approval of
Demand Side Management Plan Including a Demand Side Management
Rate Rider and Portfolio of Energy Efficiency Programs
Docket No. 2009-261-E

Dear Mr. Terreni:

Enclosed please find for filing the Petition to Intervene of the Southern Environmental Law Center and the South Carolina Coastal Conservation League in the above-captioned matter. By copy of this letter and enclosures, I am serving all parties of record.

Sincerely,

s/ Kate Double
Administrative Legal Assistant

cc: Parties of Record

GT/kd

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2009-261-E

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)	
In the Matter of:)	
)	
South Carolina Electric & Gas)	
Company's Request for Approval of)	PETITION TO INTERVENE
Demand Side Management Plan)	
Including a Demand Side)	
Management Rate Rider and)	
Portfolio of Energy Efficiency)	
Programs)	

The Southern Environmental Law Center ("SELC") and the South Carolina Coastal Conservation League ("CCL") (collectively, "Petitioners") hereby petition the South Carolina Public Service Commission ("Commission"), pursuant to R.103-825 of the Commission's rules, to intervene in this docket. In support of this petition, Petitioners state as follows:

1. On June 30, 2009 South Carolina Electric & Gas ("SCE&G") filed an application with the Commission requesting approval of a portfolio of energy efficiency and demand side management programs and establishment of an annual rider to recover the costs of those programs, lost margins and an incentive.

2. SELC is a non-profit regional environmental organization, organized under the laws of the State of North Carolina. SELC is dedicated to the protection of natural resources in the Carolinas and throughout the Southeast. SELC works to protect the health of South Carolina residents by advocating for energy conservation and

efficiency policies and for emissions reductions at electric utility plants in South Carolina. The street address of SELC's South Carolina Office is: 38 Broad Street, Suite 200, Charleston, SC 29401. The mailing address is: P.O. Box 609, Charleston, SC 29402.

3. SELC has members who are customers of SCE&G. SELC and its members are interested in promoting greater reliance on energy conservation and efficiency measures to meet South Carolina's energy needs.

4. SELC seeks to intervene in this proceeding in order to ensure that its members' interests in promoting energy efficiency are represented.

5. CCL is a nonprofit corporation organized under the laws of the State of South Carolina. The principal address of CCL is P.O. Box 1765, Charleston, SC 29402. As an advocate for conservation and energy efficiency, CCL supports development of energy policy that is in the public interest of South Carolinians.

6. CCL has members in South Carolina in who receive electricity service from SCE&G who would be subject to direct impacts of SCE&G'S demand-side management plan.

7. CCL seeks to intervene in this proceeding in order to ensure that its members' interests in promoting energy efficiency are represented.

8. Given the state of the record at this early stage of the proceeding, Petitioners lack sufficient information to develop and state their position at this time.

9. Petitioners are represented by the following counsel in this proceeding:

J. Blanding Holman, IV
Southern Environmental Law Center
P.O. Box 609
Charleston, SC 29402
Telephone: (843) 720-5270
Fax: (843) 720-5240

WHEREFORE, Petitioners pray that they be allowed to intervene in this matter.

Respectfully submitted this 5th day of August, 2009.

s/ J. Blanding Holman, IV
SC Bar No. 72260
Southern Environmental Law Center
P.O. Box 609
Charleston, SC 29402
Telephone: (843) 720-5270
Fax: (843) 720-5240

Attorney for Petitioners

CERTIFICATE OF SERVICE

I hereby certify that the following persons have been served via U.S. Mail with a copy of the Petition to Intervene of the Southern Environmental Law Center and the South Carolina Coastal Conservation League:

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This 5th day of August, 2009

s/ Kate Double
Administrative Legal Assistant